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January 12, 2024

Via ECF

The Hon. Robert J. Kugler
United States District Judge
USDC, District of New Jersey
Mitchell H. Cohen Building & U.S.
Courthouse
4th & Cooper Streets, Room 1050
Camden, NJ 08101

**Re: *In re Valsartan, Losartan, and Irbesartan Products Liability Litigation*,
No. 1:19-md-02875-RBK-SAK (D.N.J.)**

Dear Judge Kugler:

I write on behalf of the Defendants' Executive Committee and the ZHP, Teva, and Torrent Defendants, and with the consent of the Plaintiffs' Executive Committee and Plaintiff MSP Recovery Claims, Series LLC, as a follow-up to my letter to the Court of December 15, 2023.

In accordance with Case Management Order 32B, ECF [2546](#), the parties previously submitted their proposed schedule for supplemental depositions and Rule 702 briefing for damages experts. Due to some unexpected and unavoidable scheduling conflicts, the parties have agreed to amend their proposed supplemental deposition and Rule 702 briefing schedule as follows:

- Supplemental depositions of damages experts are to be completed by February 5, 2024, with the supplemental deposition of Plaintiffs' expert, Rena Conti, scheduled for February 1, 2024, and the supplemental deposition of Defendants' expert, Wayne Gibson, scheduled for February 5, 2024.
- The parties will file their respective opening Rule 702/*Daubert* motions on damages experts on February 12, 2024, with responses due on February 26, 2024, and replies due on March 6, 2024.

Thank you for your attention to these matters. The parties are available to address any questions from the Court.

Very truly yours,

/s/ Gregory E. Ostfeld